## 



## **U.S. Department of Justice**

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

February 8, 2023

## **BY ECF**

The Honorable Lorna G. Schofield United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Re: United States v. Dashae Trotman, 23 Cr. 63 (LGS)

Dear Judge Schofield:

The Government writes, on behalf of both parties, to propose a schedule for discovery, the filing of motions, and a status conference in accordance with the Court's order dated February 3, 2023 (<u>Dkt. 8</u>). The parties have conferred and propose the following schedule to the Court:

- March 7, 2023: Rule 16 discovery deadline
- April 21, 2023: Deadline for defense motions
- May 5, 2023: Deadline for government response
- May 12, 2023: Deadline for defense reply
- June 12, 13, or 14, 2023: Status conference

In addition, the Government respectfully requests that the Court exclude time under the Speedy Trial Act for the period from the filing of the scheduling order through the pre-trial conference in order to allow the parties time to assemble, produce, and review discovery, file and respond to any motions, and have an opportunity to engage in discussions regarding potential pretrial resolutions of this case. The Government submits that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendants in a speedy trial under the circumstances. Defense counsel has informed the Government that it consents to this request.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

Katherine Cheng

Assistant United States Attorney

Tel.: (212) 637-2492

cc: Martin Cohen, Esq. (via ECF)

Application Granted. Rule 16 discovery shall be completed by March 7, 2023. Defendant's motion(s), if any, shall be filed by April 21, 2023. The Government's response, if any, shall be filed by May 5, 2023. Defendant's reply, if any, shall be filed by May 12, 2023. The parties shall appear for a status conference on June 12, 2023, at 10:30 a.m. The Court finds that the ends of justice served by excluding the time between today and June 12, 2023, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because the exclusion will permit the parties to produce and review discovery, prepare and respond to any motions, and potentially engage in discussions regarding a pretrial resolution. It is hereby ORDERED that the time between today and June 12, 2023, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 9.

Dated: February 9, 2023 New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE